

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KIMBRA CRISWELL,)	
)	
Plaintiff,)	
v.)	C.A. No. 05-CV-00321 GMS
)	
LYDIA ADAIR MCFADDEN and CHRISTIANA)	
CARE HEALTH SERVICES, INC.,)	JURY TRIAL DEMANDED
)	
Defendants.)	

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

Defendants, Christiana Care Health Services, Inc. and Lydia Adair McFadden, by and through the undersigned counsel, submit the following proposed *voir dire* questions to be used in the trial of this matter.

1. Have you or any relative or close friend been involved in a civil lawsuit claiming personal injuries, or made such a claim that did not go to court?
2. Do you have a personal injury claim or lawsuit pending at this time?
3. Have you or any relative or close friend been diagnosed with reflex sympathetic dystrophy?
4. Have you been injured at your place of employment?
5. Is there any reason why you would not be able to return a verdict for or against Plaintiff or Defendant if the evidence supported such a verdict?
6. Do you or any relative or close friend work for a hospital or in the healthcare profession?

WHITE AND WILLIAMS LLP

/s/ Deborah J. Massaro

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